REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-56 are pending in this application.

Rejections Under 35 U.S.C. §102 and §103:

Claims 1-35 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Schulhof et al (U.S. '541, hereinafter "Schulhof"). Applicant respectfully traverses this rejection.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Applicant submits that Schulhof fails to disclose each element of the claimed invention. For example, Schulhof fails to disclose or suggest a device for insertion into a standard tape player comprising a housing having substantially the same physical dimensions as a standard audio cassette and/or a processor which is operable to access encrypted digital information stored in a storage device, arranged or embodied in the housing, for decrypting the digital information and for controlling transmission of decrypted audio information to an interface embodied in the housing as required by independent claims 1 and 11 and their respective dependents.

This feature is supported by, for example, Figs. 1-2 which illustrate a device for insertion into a standard tape player. The device includes a housing 100. A processor 210 is embodied within housing 100.

Col. 5, lines 8-13 of Schulhof discloses a portable audio recording and playback device. The portable device includes a playback mechanism for retrieving stored data

from a storage medium and converting the data into audio signals for playback through an external amplifier "such as an automobile radio, via FM or cassette tape modulation, or appropriate personal listening device such as a Walkman®." While Schulhof thus discloses playback through an audio amplifier, such as an automobile radio, via FM or cassette tape modulation, no details are given with respect to this "FM or cassette tape" modulation. Schulhof therefore fails to disclose or even suggest a housing having substantially the same dimensions as a standard audio cassette, let alone having a storage device for storing encrypted digital information arranged within this audio cassette type housing.

Fig. 2 of Schulhof discloses a portable storage medium 50 which stores digital information. The portable storage medium 50 may be carried (60) to mobile docking station 42. However, Fig. 2 and all other portions of Schulhof fail to disclose portable storage medium 50 being docked within a housing having substantially the same physical dimensions as a standard audio cassette. Indeed, Fig. 2 illustrates an optional tape input 45 connected to mobile docking station 42. There is no disclosure or suggestion whatsoever that portable storage medium 50 has any relationship with tape input 45. First, the tape input 45 is "optional" as explicitly noted in Fig. 2. Second, portable storage medium 50 is docked into a completely different portion of station 42 than that portion of station 42 which is connected to tape input 45. If anything, Fig. 2 thus teaches away from a storage device for storing digital information being arranged within a housing having substantially the same physical dimensions of a standard audio cassette.

This feature and others allow exemplary embodiments of the present invention to provide an audio cassette emulator.

Independent claims 1 and 11 further require a processor embodied in the housing for decrypting encrypted digital information. While col. 9, lines 37-46 disclose an encryption scheme such as a public key system (e.g., RSA), Schulhof is silent regarding a processor embodied within an audio cassette type housing for decrypting the encrypted information.

Dependent claim 2 requires the housing of the device including an insertion port for removably receiving the storage device. Schulhof fails to disclose this feature. While col. 11, lines 56-58 disclose docking ports for receiving an audio storage medium 50, this portion (and all other portions) of Schulhof fail to disclose an audio cassette type housing having an insertion port for removably receiving a storage device. The housing is part of a device which is inserted into a standard tape player.

Dependent claim 10 further requires the device further including "a connector for connecting said device to an external speaker, said processor being operable to control operation in a cassette emulator mode and in an audio player mode independent of said standard tape player. Schulhof fails to disclose this claimed feature. This claimed feature is supported by, for example, Fig. 8 of the originally-filed application. Col. 12, lines 3-11 of Schulhof discloses a portable medium 50 being docked into mobile docking station 42. In the mobile docking station 42, a select circuit 63 identifies the content of portable storage medium 50 and a processor 64 reads, decompresses the program material, and

converts the digital material to an analog audio signal that may be used to drive a modulator 61 which, in turn, provides an analog RF signal. This portion of Schulhof (and all other portions) fail to disclose, for example, a cassette emulator mode and an audio player mode independent of a standard tape player. Similar comments apply to dependent claims 14 and 20.

Independent claim 15 and claims 16-20 which depend therefrom require a device for insertion into an audio tape player, the device comprising, *inter alia*, "a plurality of sensors to detect the state of said audio cassette player; and a processor responsive to the state of at least one of said plurality of sensors for controlling said device to initiate an operation emulating the user selected operation on said audio cassette player." Schulhof fails to disclose this claimed feature. Section 13 of the Office Action merely states "As per claims 15, all the limitations of this claim have already been addressed (see claims 1, 6-7, 10)." Applicant respectfully disagrees. The Office Action fails to even begin to discuss how the above features required by claim 15 are disclosed by Schulhof. These features are not explicitly required by claims 1, 6-7 and 10 and thus the allegation of the Office Action that "As per claims 15, all the limitations of this claim have already been addressed (see claims 1, 6-7, 10)" is erroneous.

Similar to independent claim 15, new independent claim 33 requires detecting by sensors the state of an audio cassette player and controlling by a processor responsive to the state of at least one of the sensors a device to initiate an operation emulating the user

selected operation on an audio cassette player. Schulhof fails to disclose or suggest these claimed limitations.

Independent claim 21 and claims 22-30 which depend therefrom require, *inter alia*, "requesting audio information by a user from a vendor providing an indication of audio information to be acquired and an indication of a unique identity of the device to receive the audio information, [and] receiving audio information encrypted by the vendor using a device cryptographic key that corresponds to the indication of the unique identity of the device, said device cryptographic key being unique to the device." Schulhof fails to disclose or even suggest these claimed features.

Independent claim 31 and claims 32-34 which depend therefrom require "decrypting by said processor said encrypted digital information", the processor being embodied in an interface device for insertion into an audio tape player. As discussed above, while Schulhof discloses known data encryption schemes, Schulhof fails to disclose utilizing a processor embodied in an interface device for insertion into an audio tape player performing the decryption.

Independent claim 35 requires "detecting changes in operation of the equipment intended to control the magnetic media; and generating an audio message relating to the performance presentation in response to the user actuating at least one of said user controls." Schulhof fails to disclose the above claimed features. The Office Action even fails to identify any specific portions of Schulhof which allegedly disclose these claimed features. If the next Office Action maintains the rejection of claim 35 over Schulhof,

Applicant respectfully requests that the next Office Action identify what portion(s) of Schulhof disclose the above claimed features.

Accordingly, Applicant respectfully submits that claims 1-35 are not anticipated by Schulhof and respectfully requests that the rejection of these claims under 35 U.S.C. §102(b) be withdrawn.

Claims 36-46 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Schulhof in view of Stokes (U.S. '515). Applicant respectfully traverses this rejection. Claims 36-46 depend from claim 35 and thus the above comments with respect to Schulhof and claim 35 apply equally to claims 36-46. Stokes fails to remedy the above described deficiencies of Schulhof. For example, claim 35 explicitly requires generating an audio message relating to performance presentation, whereas Stokes relates only to messages displayed on an LCD or similar display. Accordingly, Applicant submits that claims 36-46 are not "obvious" over Schulhof and Stokes and respectfully requests that the rejection of claims 36-46 under 35 U.S.C. §103 be withdrawn.

New Claims:

New claims 47-56 have been added to provide additional protection for the invention. Claim 47 depends from independent claim 11 and claims 48-49 depend at least indirectly from independent claim 31. Claims 50-56 depend at least indirectly from independent claim 21. These new claims are thus allowable for at least the reasons discussed above with respect to their respective base claims.

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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